GULF RESOURCES & CHEMICAL CORPORATION

Gene M. Baker
Vice President, Operations

505 Front Avenue, Suite 303
P. O. Box 2199
Coeur d'Alene, Idaho 83814
(208) 765-2261

January 29, 1990

Mr. William Longston
On-Scene Coordinator
Superfund Response and Investigation Section
U.S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, WA 98101

RE: Administrative Unilateral Order, EPA Docket Number 1089-10-21-106

Dear Mr. Longston:

Gulf Resources and Chemical Corporation, in coordination with the other Respondents named in the above-referenced order (for simplicity's sake, referred to below as "BLP"), has completed the immediate response actions to which all agreed in our meeting with the EPA on November 2, 1989. The specific responses are detailed as follows:

Copper Dross Flue Dust Pile

Paragraph 42 of the 106 Order requires the respondents to "...immediately conduct, under the direction and approval of the U.S. EPA On-scene Coordinator, all measures necessary to stabilize and contain the Copper Dross Flue Dust Pile, and all other material piles and waste piles at the Bunker Hill Complex..."

During discussions with EPA on November 2, it was determined that the only pile that EPA was concerned with under the 106 Order was the CDFD Pile. It was also determined that EPA's preferred plan for stabilizing the CDFD pile was to spray the pile with a copolymer emulsion. EPA had determined that "Marloc," a copolymer emulsion used for stabilizing soils and dust control, would be an environmentally sound and cost-effective means of stabilizing the CDFD Pile.

On the afternoon of November 21, Nelson Landscaping applied the Marloc in two batches. Each batch consisted of 75 gallons of Marloc, 250 pounds of wood fiber, and one gallon of R-54 aurfactant, mixed in 1,125 gallons of water. Conditions for the application were excellent for this time of year with temperatures of 45° F and clear weather. On November 22, Jeff Webb, the EPA On-Scene Coordinator, inspected the CDFD Pile and stated that he was satisfied with the application of the Marloc. BLP completed installation of the chain link fence around the CDFD Pile during the week of November 27.

Asbestos Abatement

Paragraph 46 of the 106 Order required that the Respondents undertake "...asbestos contamination response actions..." at the McKinley Avenue Steam Line, the Lead Smelter area, the Zinc Plant area, and the Lurgi Baghouse as well as removal of asbestos contaminated soil from these areas, bags of asbestos-containing materials from the Craft Shop and "...any other asbestos or asbestos containing material at the discretion and direction of the U.S. EPA On-Scene Coordinator."

Following a tour of the site in which OSC Jeff Webb and Tonya Hardesty of EPA's Air and Toxics Division detailed specific portions of the asbestos on the various pipes and ducts which needed to be removed as well as additional areas from which asbestos samples were to be collected, bid specifications for the asbestos abatement were prepared.

Insulation Removal Specialists (IRS) of Spokane began the first phase of the asbestos abatement on November 18 and this work was completed on December 6. During this period, however, several samples ordered by the EPA showed high levels of asbestos and caused the EPA to require additional abatement as provided in Paragraph 46(F) of the 106 Order.

The second phase of the asbestos abatement was completed on December 18. EPA OSC Jeff Webb, accompanied by Bob Glassen and Dave Diedtrich of Dames & Moore, Dan Meyer of BLP, and Jerry Warren of IRS, completed an inspection of the site on December 19. Mr. Webb stated that the asbestos abatement required by the 106 Order had been completed to his satisfaction. A total of 121,450 pounds of asbestos waste was removed from the site and disposed of at the Sudbury Landfill, an EPA-approved facility, west of Walla Walla, Washington.

Soil and asbestos removed during the ground cleanup required by the EPA was packed in poly bags and placed in new, 17-H steel drums. There are 37 of these drums.

The original plan was to stage the drums in the Craft Shop at the Zinc Plant to await disposal in a permanent on-site repository, but EPA objected to this. Therefore, plans were made to dispose of these drums at Chemical Waste Management's facility in Arlington, Oregon. However, when samples of drums were collected to ship with the Waste Profile Sheet, it was discovered that when the samples reached room temperature, there had been sufficient snow and ice removed with the soil and asbestos to result in free water in the sample. Because the material containing "free liquids" cannot be disposed of at Arlington, it was decided to stage the drums near the Craft Shop until Spring, mix the soil/asbestos with sufficient vermiculite to absorb the free water, and then dispose of this material at Arlington. EPA has concurred with this approach.

Sulfuric Acid/Mercury Sludge Tank

Paragraph 43 of the 106 Order states that the "Respondents shall immediately conduct, under the direction and approval of the U.S. EPA On-Scene Coordinator, all measures necessary to stabilize and contain the sulfuric acid and/or mercury sludge tanks and containers, and all other drums, tanks, and other storage containers for liquid wastes, sludges, and hazardous substances."

During discussions with EPA and BLP in early November, it was determined that EPA's concern with respect to Paragraph 43 of the 106 Order was a 45-foot diameter storage tank at the Zinc Plant which contained approximately 50,000 to 55,000 gallons of sulfuric acid and sludge contaminated with mercury.

It was decided with EPA concurrence that the first priority would be to remove the approximately 25,000 gallons of sulfuric acid overlying the sludge. After investigating options including transportation and treatment/disposal off-site, it was determined that the most cost-effective and environmentally sound means of dealing with the acid would be to pump it to a tanker truck and carry it to the on-site Central Treatment Plant (CTP) for treatment by aeration and lime precipitation. Permission to treat the acid in this manner was received from the EPA on December 5. Transfer of the acid to the CTP for treatment began on December 7, 1989, and was completed on January 8, 1990. Approximately 25,000 gallons of acid were treated.

On January 5, the thickness of the layer of sludge left in the tank was 29.25 inches, or 29,000 to 30,000 gallons. It was determined that the most cost-effective means to "stabilize and contain" the tank as required by the Order would be to weld a band of steel, 1/8-inch thick and 36 inches high around the bottom of the tank. This plan was submitted to EPA on January 8 and was approved by you on January 9. Work on the tank began on January 16 and was completed on January 22.

We trust that you agree that Gulf Resources and Chemical Corporation has complied with those immediate response provisions of the 106 Order addressed in this letter, and would appreciate written confirmation of that fact.

Sincerely,

Gene M. Baker
Vice President, Operations

GMB:lr

cc: Bob Glassen
✓John Meyer
Barry Tierney